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Mr. Todd Thompson
State Water Resources Control Board
Division of Water Quality
P.O. Box 944213
Sacramento, CA 94244-2130

Dear Mr. Thompson:

Subject: Comments on Draft EIR for General Waste Discharge
Requirements for Biosolids Land Application

Thank you for the opportunity to comment on the subject document. The Sacramento Regional County Sanitation District (District) provides wastewater conveyance and treatment services to approximately 1.2 million customers in the metropolitan Sacramento Area. The Sacramento Regional Wastewater Treatment Plant currently produces approximately 25,000 dry tons of biosolids annually. The District has managed a portion of these biosolids in the past by land application to farm fields in Sacramento, Solano, and Alameda counties.

The SWRCB is to be commended for its efforts to develop a General Order for biosolids land application. Development of the General Order will, in the long run, prove to be beneficial for the wastewater industry as it grapples with the issues and concerns associated with biosolids management.

Mitigation measures 10-1 and 10-2 are a particular concern. Imposition of VMT limits associated with the biosolids beneficial use sites could actually increase overall air emissions if agencies are forced to haul biosolids to more-remote sites after the VMT limits for closer sites have been used. In addition, the VMT limits could result in increased biosolids disposal in landfills, which AB 939 clearly maintains is not in the public's overall best interest. Therefore, the SWRCB should consider overriding mitigation measures 10-1 and 10-2 as a matter of public policy.

Several other minor comments are provided on the attached table. Please feel free to call me at (916) 875-9205 if you have any questions.

Sincerely,

Craig Lekven
Biosolids Program Manager

attachment

Sacramento Regional County Sanitation District
Comments on Draft Environmental Impact Report

Location	Comment
Table 5-1	Units of measure need to be defined in the table.
Table 5-4	Units of measure need to be defined in the table.
Page 5-38, Horticultural Use, 1 st paragraph, 3 rd sentence	The District understands that the GO would only be used to regulate Class A, exceptional quality biosolids when application is at high rates (greater than 10 dry tons/acre-yr or 20 dry tons/ac-yr, depending on the quantity of biosolids in the mixture). The nutrient requirements for horticultural projects would be similar to agricultural crops. Given the typical nitrogen concentrations found in biosolids, it appears most horticultural projects would not be required to apply for coverage under the GO, unless biosolids are to be applied at very high rates. Therefore, the statement "use of Class A biosolids for larger scale landscaping projects would be subject to the GO" is not necessarily true.
Page 6-3, Agriculture, 4 th and 6 th sentences	Please change wording from "biosolids disposal sites" to "biosolids recycling sites" or "biosolids beneficial use sites". Industry terminology is to use the term "disposal" only when biosolids are landfilled or otherwise not being put to beneficial use. Biosolids are used for beneficial purposes at agricultural sites, not disposed.
Page 10-5, Methods, 3 rd paragraph, 1 st sentence.	The District understands that the GO requirement to cover stored biosolids between October 1 and April 30 is to prevent precipitation from contacting biosolids and washing them away. While the cover may provide some odor control, it is not required during the warm weather months, when biological activity in the biosolids will be highest. The District recommends deleting the last part of the sentence.
Table 15-1, Mitigation Measure 4-1, Monitoring and Enforcement Action	Change "phytoxicity" to "phytotoxicity".

9-1

9-2
9-3
9-4
9-5
9-6
9-7

Responses to Comments from the Sacramento Regional County Sanitation District

- 9-1. See Master Response 5.
- 9-2. The units of measure for the column headed Density of Biosolids should be (no/gm dry wt) as shown in Tables 5-2 and 5-3. The units of measure for the column headed Survival Time should be Days as shown in Tables 5-2 and 5-3. The units of measure for the column headed Infectious Dose should be Numbers of Organisms and should be included in Tables 5-1, 5-2, 5-3 and 5-4.
- 9-3 See response 9-2 for units of measure that were omitted in draft EIR Table 5-4.
- 9-4. The commenter requested that language in the public health analysis regarding horticultural activities be modified. The third sentence of the first paragraph on page 5-38 of the draft EIR is hereby revised as follows:
- Use of Class A biosolids for larger scale landscaping projects would be subject to the proposed GO if the material were applied at high rates.
- 9-5. The fourth and sixth sentences on page 6-3 of the draft EIR are hereby revised as follows:
- Types of crops commonly grown on agricultural biosolids ~~disposal~~ land application sites are row crops that are not typically used for human or dairy animal consumption . . . The visual impact of such sites is limited, and because they are located away from urban centers and major highways, most people are unaware of their status as biosolids ~~disposal~~ land application sites.
- 9-6. The proposed GO has been modified to require that any biosolids stored for more than 24 hours at the application site must be covered. This action will provide odor control, dust control, and runoff protection throughout the year.
- 9-7. Table 15-1, Mitigation Measure 4-1 (under the Monitoring and Enforcement Action column) of the draft EIR is hereby revised such that “phototoxicity” is changed to “Phytotoxicity.”